

REMARKS/ARGUMENTS

Prior to entry of this amendment, the application included claims 1, 3-18, 22-26, and 28-30. Claims 1, 22 and 26 have been amended. No claims have been canceled or added. Therefore, claims 1, 3-18, 22-26, and 28-30 remain present for examination.

An Office Action mailed July 31, 2007 (hereinafter referred to as the "Office Action") rejected claims 1, 3-18, 22-26, and 28-30 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,473,500 to Risafi ("**Risafi**").

Rejections Under 35 U.S.C. § 102

Claims 1, 3-18, 22-26, and 28-30 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,473,500 to Risafi ("**Risafi**").

The independent claims have been amended to clarify certain aspects of the invention. In particular, the claims have been amended to clarify that the conversion of value occurs between a transfer from a first value provider to a second value provider. This is illustrated, for example, in Fig. 2A of the Application and is described at, *e.g.*, ¶¶ [26]-[30] of the Application. The exchange provider determines the exchange rate for the value in response to receiving the value. The value is received from the first value provider in response to a request to transfer the value to the second value provider (Application, p. 4, ll. 22 – 24).

The combination of limitations in the amended claims embraces a method and system that effect transfers of value between entities that store value on behalf of customers. These value transfers are effected through a separate exchange provider that determines the exchange rate in response to a request for a transfer and in response to receiving the value from the first value provider.

Such an arrangement is distinct from what is disclosed in Risafi. Risafi which instead describes a transfer without a conversion. Risafi provides for a prepaid phone card where the value is in the form used. *See Risafi*, col. 16, lines 34-35 ("FIG. 9b illustrates the processes of using the prepaid telephone card."). The value for the prepaid phone card is measured in time, "During the call, step 934 keeps track of the length of the call and each unit of time, *e.g.*, each

minute, decrements the usage time by one unit. This time unit can be more or less than one minute, depending on the policies and the processing capability of the TELCO.” *Risafi*, col. 16, lines 50-54. Indeed, the value on the card is decremented in minutes not some other value. *See Risafi*, col. 16, lines 58-60 (“the process loops back to step 934 to decrement the time when the next minute passes.”). In reloading the card, more phone time is added to the card. *See Risafi*, col. 17, lines 32-34 (“Once reloaded, step 930 is repeated in which the TELCO notifies the card user how much phone time remains in the card account.”).

The claimed method and system include an exchange provider which converts the value between the first value provider and the second value provider. *Risafi* does not include any conversion between the first value provider and the second value provider. *Risafi* allows for a value card with value in one form. For example, in the prepaid phone card example, *Risafi* uses minutes from a first value provider to pay for a phone call using the system of the TELCO, the second value provider. Value is not converted between the value card and the TELCO.

Further, *Risafi* fails to provide a component that is similar to the exchange provider. There is no component that has any function between the value card and the TELCO in *Risafi*. As such, *Risafi* completely fails to provide a system, different from the first value provider and the second value provider, which can convert value. *Risafi* simply moves value from the value card to the second value provider.

With respect to the specific claim language, *Risafi* does not anticipate any of the independent claims because it does not teach or suggest “in response to receive the value, determining an exchange rate for the value with the processor of the exchange provider;” “converting the received value with the processor of the exchange provider to the converted form in accordance with the determined exchange rate” *Risafi* lacks any disclosure of “the exchange provider is different from the first value provider and different from the second value provider,” instead disclosing moving value in a set form from a value card to the second value provider. Furthermore, *Risafi* lacks any disclosure that the value is converted between the first value provider and the second value provider.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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